



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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COMMISSION  
SECRETARIAT

MAR -7 A 10: 33

**SENSITIVE**

**MEMORANDUM**

**TO:** The Commission

**FROM:** Anthony Herman  
General Counsel

Daniel A. Petalas  
Associate General Counsel for Enforcement

Kathleen M. Guith  
Deputy Associate General Counsel for Enforcement

**BY:** Peter G. Blumberg  
Assistant General Counsel

Thomas J. Andersen  
Attorney

Marianne Abbot  
Attorney

**SUBJECT:** MUR 6040 (Rep. Charles B. Rangel, *et al.*)

**RE:** Pre-Probable Cause Conciliation Agreements

**CELA**

2012 MAR -7 AM 10: 18

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Attached are two separate conciliation agreements signed by counsel for the Respondents in this matter. Attachments 1 & 3. These agreements, which we recommend that the Commission accept, would settle violations of 2 U.S.C. § 441a(a)(1)(A) and (C) by Fourth Lenox Terrace Associates a/k/a Lenox Terrace Development Assoc. ("Fourth Lenox"); 2 U.S.C. § 441a(f) by Representative Charles B. Rangel, his authorized campaign committee, Rangel for Congress and Basil Paterson, in his official capacity as treasurer ("RFC"), and his leadership committee, the National Leadership PAC and Basil Paterson, in his official capacity as treasurer ("NLP") (collectively "the Committees"); and 2 U.S.C. § 434(b) by the Committees.

1 As set forth in the agreements, the Committees and Rep. Rangel accepted  
2 excessive in-kind contributions from the landlord, Fourth Lenox, as a result of the  
3 Committees paying less than the usual and normal charge for office space by occupying a  
4 rent-stabilized apartment under terms and conditions that Fourth Lenox did not offer to  
5 similarly situated non-political committee tenants.

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**RECOMMENDATIONS**

1. Accept the attached signed conciliation agreement with Fourth Lenox Terrace Associates a/k/a Lenox Terrace Development Associates;
2. Accept the attached signed conciliation agreement with Representative Charles B. Rangel, Rangel for Congress and Basil Paterson, in his official capacity as treasurer, and the National Leadership PAC and Basil Paterson, in his official capacity as treasurer

- 1        3. Approve the appropriate letters; and
- 2
- 3        4. Close the file.
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